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GUC Trust Administrator

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
	:
MOTORS LIQUIDATION COMPANY, et al.,	:
f/k/a General Motors Corp., et al.	:
	:
Debtors.	:
	:
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	Chapter 11 Case No.
	09-50026 (MG)
	(Jointly Administered)

**NOTICE OF HEARING ON MOTION OF WILMINGTON TRUST COMPANY, AS
GUC TRUST ADMINISTRATOR, FOR AN ORDER AUTHORIZING EXPEDITED
DISTRIBUTION TO HOLDERS OF 502(h) CLAIMS RESULTING FROM THE AAT
SETTLEMENT AGREEMENT PURSUANT TO SECTIONS 5.3 AND 5.8 OF THE GUC
TRUST AGREEMENT**

PLEASE TAKE NOTICE that on July 23, 2019, Wilmington Trust Company, solely in its capacity as trust administrator and trustee (in such capacity, the “**GUC Trust Administrator**”), of the Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by the above-captioned debtors (collectively, the “**Debtors**”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan dated March 18, 2011, (the “**Movant**”) filed a motion (the “**Motion**”) for an order authorizing the expedited distribution to holders of 502(h) claims resulting from the AAT settlement agreement, all as more fully described in the Motion, and that a hearing will be held before the Honorable Judge Martin Glenn, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling

Green, New York, New York 10004, on **August 12, 2019 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to this Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) McDermott, Will & Emery LLP, attorneys for Wilmington Trust Company as GUC Trust Administrator, 340 Madison Ave., New York, New York 10173 (Attn: Kristin K. Going, Esq.); (ii) FTI Consulting, as the GUC Trust Monitor, 3 Times Square, 11th Floor New York, NY 10036 (Attn: Conor Tully); Wachtell, Lipton, Rosen & Katz, Attorneys for JPMorgan Chase Bank, N.A. 41 West 52nd Street, New York, New York 10019 (Attn: Marc Wolinsky, Esq, Harold S. Novikoff, Esq. and Amy R. Wolf, Esq.) Kelley Drye & Warren LLP, Attorneys for Defendant JP Morgan Chase Bank, N.A. 101 Park Avenue, New York, New York, 10178 (Attn: John M. Callagy, Esq., Nicholas J. Panarella, Esq., Martin A. Krolewski, Esq; Jones Day Attorneys for Defendant JP Morgan Chase Bank, N.A. 250 Vesey Street, New York, New York 10281 (Attn: C. Lee Wilson, Esq.) (iii) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, New York 10014 (Attn: William K. Harrington, Esq.), so as to be received no later than **August 5, 2019 at 4:00 p.m. (Eastern Time)** (the "**Objection Deadline**").

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Motion, Movant may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
July 23, 2019

McDermott, Will & Emery LLP

By: /s/ Kristin K. Going

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